

STATE OF NEW YORK  
SUPREME COURT :: COUNTY OF ERIE

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ERIC C. MARTIN,

Plaintiff,

v.

**ANSWER TO CROSS CLAIMS  
OF CO-DEFENDANTS**

Index No. 808523/2021

THE TOWN OF TONAWANDA  
POLICE DEPARTMENT  
o/b/o THE TOWN OF TONAWANDA,  
SPEEDWAY, LLC,  
MARATHON PETROLEUM CORPORATION,  
and JOHN DOES #1, 2, 3, 4, 5, 6, 7, 8  
as employees of Defendant TOWN OF  
TONAWANDA POLICE DEPARTMENT,

Defendants.

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Defendants THE TOWN OF TONAWANDA POLICE DEPARTMENT o/b/o THE  
TOWN OF TONAWANDA, by and through its attorneys, Colucci & Gallaher, P.C.,  
responds to codefendant SPEEDWAY, LLC's cross claim as follows:

1. Denies the allegations contained in co-defendant Speedway, LLC's Cross  
Claim, referenced in paragraph 19 of its answer, as alleged against the Defendant The  
Town of Tonawanda Police Department o/b/o The Town of Tonawanda.

DATED: Buffalo, New York  
September 10, 2021

COLUCCI & GALLAHER, P.C.



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Tonawanda Police Department o/b/o  
The Town of Tonawanda*

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**Affirmation of Service**

Paul G. Joyce, affirms that a true and complete copy of the foregoing Answer was served via Electronic Filing at the New York State Courts Website-designated for e-filing matters to counsel of record, as follows:

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